

The Honorable Kymberly K. Evanson

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

UNITED STATES OF AMERICA, *ex rel.*
KUSHWINDER SINGH,

Plaintiff,

V.

ALEDADE, INC., *et. al.*,

Defendants.

CASE NO. 2:21-cv-0410-KKE

**JOINT STIPULATION TO EXTEND
TIME TO RESPOND TO
CONTEMPLATED AMENDED
COMPLAINT**

NOTE ON MOTION CALENDAR: JULY 22, 2024

Plaintiff Kushwinder Singh (“Plaintiff”) and Defendant Aledade, Inc. (“Defendant”) (collectively, “the Parties”), by and through their counsel of record, respectfully submit this Stipulation, and respectfully request that the Court enter the proposed order extending the time for Defendant to respond to a Second Amended Complaint (“SAC”) that Plaintiff plans to file by August 1, 2024.

1. Plaintiff filed a Complaint in this case under seal on March 25, 2021, and a First Amended Complaint under seal on May 24, 2022. The United States declined to intervene on January 9, 2024, and the Court unsealed the pleadings and other documents on file on January 10, 2024. On June 5, 2024, the Court granted the Parties' stipulated motion to extend the time for Defendant to respond to the Amended Complaint to July 22, 2024.

2. Plaintiffs will file the SAC by August 1, 2024. In the SAC, Plaintiff plans to amend his retaliation causes of action against Aledade, Inc (Counts V and VI), and remove all Federal False Claims Act (“FCA”) causes of action asserted in Counts I, II, III, and IV in the First

STIPULATED MOTION AND ORDER
TO EXTEND TIME TO RESPOND - 1
(No. 2:21-cv-0410-KKE)

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1 Amended Complaint against all Defendants, including Aledade. The SAC will not assert any
2 causes of action against the non-Aledade Defendants.

3 3. On or before August 1, 2024, the parties will stipulate to an amendment and file a
4 joint notice pursuant to Fed. R. Civ. P. 15(a)(2) and LCR 15(b) with the SAC, with the required
5 redline version of the SAC attached to the joint notice. Plaintiff will also file a final version of the
6 SAC pursuant to LCR 15(b).

7 4. Under Rule 41(a), Plaintiff will also file a notice of voluntary dismissal of the FCA
8 Counts I-IV and all non-Aledade Defendants, without prejudice to the United States, in the
9 appropriate form.

10 5. Based on the foregoing, the Parties request that the Court enter the following
11 schedule to allow Plaintiff to file the SAC and for Defendant to respond:

- 12 i. Defendant will not be required to respond to the First Amended Complaint.
- 13 ii. Plaintiff will file the SAC by August 1, 2024.
- 14 iii. Defendant will have until September 6, 2024 to answer or otherwise respond
15 to the SAC.

16 6. A proposed order is subjoined herewith.

17 DATED this 22 day of July, 2024. I certify that this document contains 367 words, in
18 compliance with the Local Civil Rules.

19 Respectfully submitted,

20
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30 *Attorneys for Defendant Aledade, Inc*

31 ORDER

32 **IT IS SO ORDERED.**

33 DATED this 22nd day of July, 2024.

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35 _____
36 Kymberly K. Evanson
37 United States District Judge